

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In Re: Joseph G. DuMouchelle,  
a/k/a Joe G. DuMouchelle, and  
Melinda Adducci,  
a/k/a Lindy J. Adducci,

Case No. 19-54531-pjs  
Hon. Phillip J. Shefferly  
Chapter 11

Debtors.

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**GOLDSTEIN BERSHAD & FRIED P.C.'S MOTION TO WITHDRAW  
AS COUNSEL FOR DEBTORS**

GOLDSTEIN BERSHAD & FRIED P.C., ("GB&F") makes this its Motion to Withdraw as Counsel for Debtors in this proceeding, and for its Motion, states as follows:

1. This is GB&F's Motion to Withdraw as Counsel for Debtors in this proceeding. A proposed Order granting the relief requested is attached hereto as Exhibit 1.

2. The Michigan Rules of Professional Conduct, Rule 1.16(b) provide in pertinent part as follows:

(b) Except as stated in paragraph (c), a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if:

(4) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled; [or]

(6) other good cause for withdrawal exists.

3. Debtors retained GB&F to represent them in this proceeding.

4. Due to a breakdown in the attorney-client relationship, GB&F is no longer able to represent the Debtors. Good cause exists in this case to allow GB&F to withdraw as counsel for Debtors. See 7A C.J.S. Attorney and Client, §221 (1997).

**WHEREFORE**, GB&F moves this Court for entry of an Order allowing it to withdraw as counsel for Debtors, Joseph G. DuMouchelle, a/k/a Joe G. DuMouchelle, and Melinda Adducci, a/k/a Lindy J. Adducci, and grant such other relief this Court deems just and appropriate.

Respectfully submitted,

GOLDSTEIN BERSHAD & FRIED P.C.

By: /s/ Aaron J. Scheinfield

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Dated: November 22, 2019

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**ORDER OF WITHDRAWAL OF GOLDSTEIN BERSHAD & FRIED P.C.  
AS ATTORNEYS OF RECORD FOR DEBTORS**

**THIS MATTER** came before the Court on the Motion of Goldstein Bershad & Fried P.C. to withdraw as counsel for Debtor. The Court finds, for the reasons stated in the Motion and on the record, that there has been a breakdown of the attorney-client relationship and that effective communication between the parties has ceased to be possible. Accordingly,

**IT IS ORDERED** that Goldstein Bershad & Fried P.C. is withdrawn as the attorneys of record for Debtors, Joseph G. DuMouchelle, a/k/a Joe G. DuMouchelle, and Melinda Adducci, a/k/a Lindy J. Adducci.

EXHIBIT "A"